



## EU Fish Processors and Traders Association

Brussels, 20 December 2019

Ref. 166/2019

To the kind attention of:

**Dr Sabine Jülicher**

Director DG SANTE Directorate E - Food and feed safety, innovation

CC

**Ms Alexandra Nikolakopoulou**

*Head of Unit E1- Food information and composition, food waste - DG SANTE*

**Subject:** AIPCE-CEP<sup>1</sup> concerns regarding Nutri-Score ratings for fishery products

Dear Dr Jülicher,

**AIPCE-CEP would like to address its concerns regarding the voluntary nutrition labelling scheme “Nutri-Score” in relation to processed fish products** (canned, smoked, frozen, marinated, etc.), as we consider that the Nutri-Score ratings for these products are not consistent with the nutritional recommendations<sup>2</sup>.

Specifically, the Nutri-Score system, in its current formulation, **does not take into account the nutritional qualities of the proteins and the long-chain omega 3s of marine origin.**

Fish products constitute the **vast majority** of the EU consumers’ intake of **long-chain omega 3s EPA and DHA**<sup>3</sup>. Despite this, products such as canned sardines and mackerel have very poor ratings in the Nutri-Score system, oscillating between “C” and “D”.

The **health and nutritional benefits of eating fatty fish** are scientifically proven and the low ratings for these products stand in contradiction with the very purpose of the Nutri-Score

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<sup>1</sup> AIPCE (EU Fish Processors and Traders Association) and CEP (European Federation of National Organizations of Importers and Exporters of Fish) were established in 1959 and collaborate on the basis of a Co-operation Agreement, creating AIPCE-CEP.

The association represents 20 EU National Associations and 2 Associations in Third countries, for a total of nearly 3,500 companies, the majority of which with 20 employees at most, for total employment of around 120,000 persons. The overall value of the output of the industry represented by AIPCE-CEP amounts to around EUR 27 billion, or three times the turnover of the catch sector.

<sup>2</sup> Food Security Agencies **recommend eating fish twice a week**, including once fatty fish (sardines, mackerel, anchovies, herring, salmon, etc.).

<sup>3</sup> according to the ANSES, **the 75% of total intake of omega 3s EPA and DHA derive from the consumption of these products** (for more information see: AVIS ANSES « Apports en acides gras de la population vivant en France. Comparaison aux apports nutritionnels conseillés définis en 2010 » 22 septembre 2015 ; <https://www.anses.fr/fr/system/files/NUT2014sa0117Ra.pdf>

labelling scheme, which should serve as valuable and simple tool to help EU consumers to make healthier choices.

As support for Nutri-Score system is fast spreading across the EU<sup>4</sup>, we call upon the relevant Member States and EU authorities to **examine urgently** the specific case of processed fish products, in order to provide the **necessary corrections** to modify the calculation that underlies Nutri-Score, thereby taking into account the nutritional benefits of eating fish products.

We would like to request a meeting to provide more details and explain our concerns.

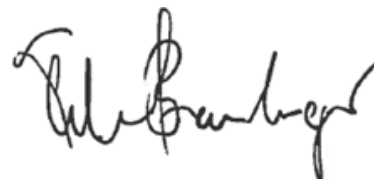
Thank you for your attention.

Kind regards,

Guus Pastoor, AIPCE President

Handwritten signature of Guus Pastoor in black ink.

Peter Bamberger, CEP President

Handwritten signature of Peter Bamberger in black ink.

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<sup>4</sup> E.g. the official Citizens initiative to make Nutri-Score mandatory in the EU (<https://ec.europa.eu/citizens-initiative/public/initiatives/ongoing/details/2019/000008>), while Member States (namely France, Belgium, Spain, Germany and The Netherlands) have already adopted or endorsed Nutri-Score as voluntary nutrition labelling scheme in their country.